

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref No. \_\_

**ORDER SUSTAINING DEBTORS' FIRST (NON-SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN AMENDED AND  
SUPERSEDED CLAIMS (NON-CUSTOMER CLAIMS)**

Upon the first omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Amended and Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Amended and Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Amended and Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover are preserved.
5. To the extent a response is filed regarding any Amended and Superseded Claim, each such Amended and Superseded Claim, and the Objection as it pertains to such Amended and Superseded Claim, will constitute a separate contested matter as contemplated by

Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Amended and Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtor may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

\_\_\_\_\_  
The Honorable John T. Dorsey  
United States Bankruptcy Judge

**SCHEDULE 1**

**Non-Customer Amended and Superseded Claims**

Amended Claims  
Schedule 1 Non-Customer

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
1	Brady Jr., Thomas Edward Patrick ADDRESS ON FILE	02/16/23	22-11068 (JTD) FTX Trading Ltd.	899	Undetermined*	Brady Jr., Thomas Edward Patrick ADDRESS ON FILE	06/27/23	22-11068 (JTD) FTX Trading Ltd.	2688	Undetermined*
2	Brady Jr., Thomas Edward Patrick ADDRESS ON FILE	02/16/23	22-11110 (JTD) Blockfolio, Inc.	909	Undetermined*	Brady Jr., Thomas Edward Patrick ADDRESS ON FILE	06/27/23	22-11110 (JTD) Blockfolio, Inc.	2890	Undetermined*
3	Calico Capital Limited (Formerly TigerWit Limited) Tim Hughes 7th Floor Augustine House 6a Austin Friars London, EC2N 2HA	02/23/23	22-11068 (JTD) FTX Trading Ltd.	1019	Undetermined*	Calico Capital Limited (Formerly TigerWit Limited) 100 Bishopsgate London, EC2N 4AG	06/29/23	22-11075 (JTD) FTX Europe AG	3763	\$842,546.55
4	Calico Capital Limited (Formerly TigerWit Limited) 100 Bishopsgate London, Surrey, EC2N 4AG	06/29/23	22-11068 (JTD) FTX Trading Ltd.	4254	\$842,546.55	Calico Capital Limited (Formerly TigerWit Limited) 100 Bishopsgate London, EC2N 4AG	06/29/23	22-11075 (JTD) FTX Europe AG	3763	\$842,546.55
5	Chen, Yiling ADDRESS ON FILE	01/23/23	22-11067 (JTD) Alameda Research Ltd	593	\$2,051,514.12	Chen, Yiling ADDRESS ON FILE	05/25/23	22-11067 (JTD) Alameda Research Ltd	2188	Undetermined*
6	CM-Equity AG Kaufingerstrasse 20 Munich, 80331	06/29/23	22-11075 (JTD) FTX Europe AG	4341	\$65,000,000.00	CM-Equity AG Kaufinger Str. 20 Munich, 80331	06/30/23	22-11075 (JTD) FTX Europe AG	4283	\$65,000,000.00

\*Indicates claim contains unliquidated and/or undetermined amounts

Amended Claims  
Schedule 1 Non-Customer

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT		CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
7	Illinois Department of Employment Security William H. Heslup, Bankruptcy Unit Supervisor 33 S. State Street 10th FL Chicago, IL 60603	06/29/23	22-11177 (JTD) LedgerPrime Bitcoin Yield Enhancement Fund, LLC	4139	\$919.75*		Illinois Department of Employment Security 33 S. State Street 10th FL Chicago, IL 60603	08/24/23	22-11155 (JTD) LedgerPrime Bitcoin Yield Enhancement Master Fund LP	5957	\$358.25*
8	Lee, Wendy ADDRESS ON FILE	06/27/23	22-11067 (JTD) Alameda Research Ltd	3256	\$5,733,974.62*		Lee, Wendy ADDRESS ON FILE	06/29/23	22-11067 (JTD) Alameda Research Ltd	3930	\$5,733,974.62
9	Lee, Wendy ADDRESS ON FILE	06/26/23	22-11067 (JTD) Alameda Research Ltd	3272	\$5,733,974.62		Lee, Wendy ADDRESS ON FILE	06/29/23	22-11067 (JTD) Alameda Research Ltd	3930	\$5,733,974.62
10	Lötscher, Marcel Address on File	06/29/23	22-11075 (JTD) FTX Europe AG	4057	\$1,400,862.00		Lötscher, Marcel ADDRESS ON FILE	06/29/23	22-11075 (JTD) FTX Europe AG	4241	\$1,400,862.00
11	Move Labs Inc. 4629 Willman Way Lexington, KY 40509	06/29/23	22-11172 (JTD) FTX Ventures Ltd.	4336	\$850,000.00		Move Labs Inc. 4629 Willman Way Lexington, KY 40509	09/28/23	22-11172 (JTD) FTX Ventures Ltd.	72770	\$850,000.00
12	Neil Patel Digital, LLC Squire Patton Boggs (US) LLP c/o Gabriel Colwell 555 South Flower Street 31st Floor Los Angeles, CA 90071	06/27/23	22-11068 (JTD) FTX Trading Ltd.	3428	\$6,000,000.00*		Neil Patel Digital, LLC Squire Patton Boggs c/o Gabriel Colwell 555 South Flower Street, 31st Floor Los Angeles, CA 90071	09/13/23	22-11068 (JTD) FTX Trading Ltd.	72713	\$6,000,000.00

\*Indicates claim contains unliquidated and/or undetermined amounts



Amended Claims  
Schedule 1 Non-Customer

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT		CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
13	New York State Department of Taxation and Finance Bankruptcy Section PO Box 5300 Albany, NY 12205-0300	04/13/23	22-11073 (JTD) Ledger Holdings Inc.	1621	\$2,000.00*		New York State Department of Taxation and Finance Bankruptcy Section PO Box 5300 Albany, NY 12205-0300	04/27/23	22-11073 (JTD) Ledger Holdings Inc.	1772	\$2,012,563.38*
14	New York State Department of Taxation and Finance Bankruptcy Section PO Box 5300 Albany, NY 12205-0300	01/13/23	22-11073 (JTD) Ledger Holdings Inc.	564	\$1,000.00*		New York State Department of Taxation and Finance Bankruptcy Section PO Box 5300 Albany, NY 12205-0300	04/27/23	22-11073 (JTD) Ledger Holdings Inc.	1772	\$2,012,563.38*
15	Nodle Limited c/o Sam J. Alberts, Dentons US LLP 1900 K Street, NW Washington, DC 20006	06/29/23	22-11067 (JTD) Alameda Research Ltd	3370	\$424,800.00		Nodle Limited Care of Sam J. Alberts, Dentons US LLP 1900 K Street, NW Washington, DC 20006	06/29/23	22-11067 (JTD) Alameda Research Ltd	3394	\$424,800.00
16	Sologenic Development Foundation Limited Mohammadreza Bashash 381-Nakhlal Jumeirah, Premise381105911 Dubai,	12/21/22	22-11067 (JTD) Alameda Research Ltd	187	Undetermined*		Manticore Securities AS 522 - 999 Canada Place Vancouver, BC V6C3T4	06/26/23	22-11068 (JTD) FTX Trading Ltd.	3515	Undetermined*
17	Tennessee Department of Revenue TDOR c/o Attorney General PO Box 20207 Nashville, TN 37202-0207	12/15/22	22-11071 (JTD) West Realm Shires Services Inc.	126	\$647.68		Tennessee Department of Revenue c/o Attorney General PO Box 20207 Nashville, TN 37202-0207	04/13/23	22-11071 (JTD) West Realm Shires Services Inc.	1633	\$1,494.42

\*Indicates claim contains unliquidated and/or undetermined amounts

Amended Claims  
Schedule 1 Non-Customer

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
18	Two Sigma Ventures III c/o Two Sigma Ventures, LP Attn: Jeremy Rossman 100 Avenue of the Americas 16th Floor New York, NY 10013	06/30/23	22-11112 (JTD) Cottonwood Grove Ltd	4471	\$499,999.98	Two Sigma Ventures III c/o Two Sigma Ventures, LP Attn: Jeremy Rossman 100 Avenue of the Americas 16th Floor New York, NY 10013	06/30/23	22-11112 (JTD) Cottonwood Grove Ltd	5045	\$499,999.98
19	Utah State Tax Commission Attn: Bankruptcy Unit 210 N 1950 W Salt Lake City, UT 84134-9000	01/18/23	22-11183 (JTD) West Realm Shires Inc.	545	\$455.32*	Utah State Tax Commission Attn: Bankruptcy Unit 210 N 1950 W Salt Lake City, UT 84134-9000	04/12/23	22-11068 (JTD) FTX Trading Ltd.	1597	\$238.64*

\*Indicates claim contains unliquidated and/or undetermined amounts